- 1		
1 2 3 4 5 6 7	PHILIP M. MILLER (SBN 87877) KIMBERLY A. HANCOCK (SBN 205567) SALTZMAN & JOHNSON LAW CORPORATION 44 Montgomery Street, Suite 2110 San Francisco, CA 94104 Telephone: (415) 882-7900 Facsimile: (415) 882-9287 pmiller@sjlawcorp.com khancock@sjlawcorp.com Attorneys for Plaintiffs	ON
8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
10	SERVICE EMPLOYEES INTERNATIONAL UNION NATIONAL INDUSTRY PENSION	Case No.: CV 11-5711 MEJ
11	FUND; STEPHEN ABRECHT, Trustee;	JOINT REQUEST TO EXTEND
12	RODERICK S. BASHIR, Trustee; KEVIN J. DOYLE, Trustee; DAVID A. STILWELL,	DEADLINE FOR MEDIATION; <del>[PROPOSED]</del> ORDER
13	Trustee; STEVEN W. FORD, Trustee; LARRY T. SMITH, Trustee; FRANK A.	
14	MAXSON, Trustee; EDWARD MANKO, Trustee; JOHN J. SHERIDAN, Trustee; and	
15	MYRIAM ESCAMILLA, Trustee, Plaintiffs,	
16	vs.	
17 18	U.S. METRO GROUP, INC., a California corporation,	
19	Defendant.	
20	On April 30, 2012, Plaintiffs and Defendants filed a Stipulation and [Proposed] Order	
21	Selecting Mediation. Docket No. 15. Thereafter, Magistrate Judge Maria-Elena James issued an	
22	order on April 30, 2012, requiring the mediation to be completed by July 29, 2012. Docket No.	
23	16. On May 22, 2012, the Court designated R. Bradford Huss as the Mediator. Docket No. 19.	
24	Good cause exists for the current mediation deadline to be extended. Plaintiffs initiated	
25	this action to collect unpaid collectively bargained contributions, interest, and liquidated damages	
26	owed by the Defendants. Due to the nature of the action, parties are currently awaiting the	
27	completion of an audit in order to properly discuss	s the case. Additionally, counsels anticipate

## Case 3:11-cv-05711-MEJ Document 21 Filed 06/25/12 Page 2 of 2

1	some unavailability due to the summer holiday season. Mediator R. Bradford Huss has agreed to	
2	such extension.	
3	Accordingly, the parties respectfully request that the Court extend the deadline to complete	
4	the mediation an additional 60 days until September 27, 2012.	
5		
6	Dated: June 25, 2012 SALTZMAN & JOHNSON LAW CORPORATION	
7		
8	$\mathbf{p}_{\mathbf{v}}$ / $\mathbf{c}$ /	
9	By: /S/ Kimberly A. Hancock Attorneys for Plaintiff	
10	Automeys for Framum	
11	Dated: June 25, 2012 LAW OFFICES OF A. JAY NORTON	
12	EAW OFFICES OF A. SAT WORTON	
13	By:	
14	By: /S/ Aura J. Norton, III Attorneys for Defendants	
15	Attorneys for Defendants	
16	IT IS SO ORDERED.	
17	Based on the foregoing, and good cause appearing, the parties shall complete the mediation	
18	by September 27, 2012.	
19		
20	Date: June 25, 2012 MARIA FLENA JAMES	
21	MARIA-ELENA JAMES United States Magistrate Judge	
22		
23		
24		
25		
26		
27		
28		